

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

IN RE PHARMACEUTICAL INDUSTRY
AVERAGE WHOLESAL PRICE
LITIGATION

MDL No. 1456

THIS DOCUMENT RELATES TO:
ASTRAZENECA MASSACHUSETTS
AND NON-MASSACHUSETTS CLASS 2
AND CLASS 3 SETTLEMENTS

CIVIL ACTION: 01-CV-12257-PBS

Judge Patti B. Saris

**PLAINTIFFS' MOTION FOR DISTRIBUTION OF THE NET SETTLEMENT
FUND TO CONSUMER CLAIMANTS AND THIRD-PARTY PAYORS IN THE
MASSACHUSETTS AND NON-MASSACHUSETTS CLASS 2 AND CLASS 3
SETTLEMENTS**

Class Plaintiffs hereby move for entry of an Order to disburse funds to all eligible consumer and Third Party Payor ("TPP") claimants in both the Massachusetts and Non-Massachusetts Class 2 and Class 3 settlements with Defendant AstraZeneca. Class Counsel has conferred with counsel for AstraZeneca, who do not oppose this motion. In support, thereof, Class Plaintiffs state as follows:

1. On February 22, 2011, the Court granted final approval to the class action settlement embodied in the parties' Revised Settlement Agreement and Release of AstraZeneca Related to Non-Massachusetts Classes Two and Three (the "National Settlement") [Docket No. 7433]. On the same date the Court granted final approval to the class action settlement embodied in the parties' Revised Settlement Agreement and Release of AstraZeneca Related to Massachusetts Classes Two and Three (the "Massachusetts Settlement") [Docket No. 7432].